

Exhibit A – Proposed Constructions and Supporting Intrinsic and Extrinsic Evidence

A. U.S. Patent No. 9,609,510

Term #	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
1	target credential (claims 1, 2, 7, 8, 9, 10, 23, 24, 25, 26, 27, 33, 34, 35, 46, 47)	<p>Not indefinite; plain and ordinary meaning</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u> '510 patent at Abstract, 5:10-7:15, 8:50-12:44, 16:27-19:26; Figs. 1-6, 15, and associated written description; claims 1-10, 21-41, 45-48.</p> <p>'510 patent and related patent file history, office actions and responses</p> <p><u>Extrinsic Evidence</u> IPR2025-00483 and -484 and related pleadings / filings / declarations</p> <p>USP App. Pub. 2009/0217364A</p> <p>USP 8,005,459</p> <p>USP 8,191,124</p> <p>USP 8,700,729</p> <p>USP 8,977,856</p> <p>USP 9,191,394</p>	<p>Indefinite</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u> '510 patent at Abstract, Fig. 2, Fig. 3, 9:4-58, 10:41-56, 11:1-37, 12:19-33</p> <p>'510 patent and related patent file history, office actions and responses</p>

Term #	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
		USP 7,634,253	

B. U.S. Patent No. 11,096,055

Term #	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
2	a user service interface to allow a user to make a user selection between the first and second service profiles, the connection manager to, responsive to the user selection, select an access network connection for the WWAN modem (claim 6)	<p>Not indefinite; plain and ordinary meaning</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u> '055 patent at Abstract, 6:30-7:65, 8:44-12:12, 12:50-13:37, 20:37-21:29, 22:24-22:67, 25:58-26:55, 27:1-28:64, 36:43-37:9, 42:14-30, 56:9-57:2, 66:35-67:4, 68:36-70:30, 96:36-104:64; Figs. 1-3, 9-14, 15A, 16, 18, 20, 29-36, and associated written description; claims 1, 2, 5, 6, 12</p> <p>'055 patent and related patent file history, office actions and responses</p> <p><u>Extrinsic Evidence</u> IPR2025-00481 and related pleadings / filings / declarations</p>	<p>Indefinite</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u> '055 patent at 8:44-67, 9:1-34, Claim 1, Claim 6</p> <p>'055 patent and related patent file history, office actions and responses</p>

Term #	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
		<i>Headwater v. Verizon/T-Mobile/AT&T</i> , Nos. 2:23-cv-00352-JRG-RSP (E.D. Tex.), 2:23-cv-00379-JRG-RSP (E.D. Tex.), 2:23-cv-00397-JRG-RSP (E.D. Tex.), Markman Orders (Dkt. 140 in -352 case; Dkt. 139 in -379 case; Dkt. 97 in -397 case) and related pleadings/filings/declarations	
3	wherein the at least one adaptive service policy control agent applies network service policies from a superset profile that provides capabilities from each of the first and second service profiles (claim 8)	<p>Not indefinite; plain and ordinary meaning</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u> <i>See</i> Intrinsic Evidence for Term #2; <i>see also</i> '055 patent at 68:37-69:56; Figs. 16-21 and associated written description; claims 1, 2, 6-8, 11-13</p> <p>'055 patent and related patent file history, office actions and responses</p> <p><u>Extrinsic Evidence</u> IPR2025-00481 and related pleadings / filings / declarations</p> <p><i>Headwater v. Verizon/T-Mobile/AT&T</i>, Nos. 2:23-cv-00352-JRG-RSP (E.D. Tex.), 2:23-cv-00379-JRG-RSP (E.D. Tex.), 2:23-cv-00397-JRG-RSP (E.D. Tex.), Markman Orders (Dkt. 140 in -352 case; Dkt. 139 in -</p>	<p>Indefinite</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u> '055 patent at 68:37-69:15, Claim 1, Claim 8</p> <p>'055 patent and related patent file history, office actions and responses</p>

Term #	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
		379 case; Dkt. 97 in -397 case) and related pleadings/filings/declarations	

C. U.S. Patent No. 11,405,429

Term #	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
4	secure modem subsystem (claim 1)	<p>Not indefinite; plain and ordinary meaning</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u> '429 at Abstract, 5:1-7:31, 9:4-11:46, 14:8-15:8, 15:37-16:38; Figs. 1-11, and associated written description; claims 1-7, 10-12</p> <p>'429 patent and related patent file history, office actions and responses</p> <p><u>Extrinsic Evidence</u> IPR2025-00482 and related pleadings / filings / declarations</p>	<p>Indefinite</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u> '429 patent at Fig. 2, 2:41-3:8, 10:49-11:10</p> <p>'429 patent and related patent file history, office actions and responses</p>